

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

MANDELBAUM SALSBURG, P.C.

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Roseland, New Jersey 07068

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Attorneys for Defendant Peony Lin

TZUHSIN YANG a/k/a
CHRISTINE YANG,

Plaintiff,

v.

PEONY LIN, an individual, and
JANE DOE, an unknown individual,

Defendants.

Civil Action No.

19-cv-8534

Motion Return Date:

November 1, 2021

**DECLARATION OF BRIAN M. BLOCK, ESQ. IN SUPPORT OF
DEFENDANT PEONY LIN'S MOTION OBJECTING TO THE ORDER OF
THE HON. EDWARD S. KIEL, U.S.M.J. DATED SEPTEMBER 20, 2021**

I, Brian M. Block, being duly sworn, states as follows:

1. I am Counsel with the law firm of Mandelbaum Salsburg P.C. and admitted to practice before this Court. I am of full age and have personal knowledge of the facts set forth herein, which are known to me to be true and correct. I could and would testify competently about the matters set forth herein if called upon to do so.

2. I submit this declaration in support of defendant's motion objecting to the order of the Hon. Edward S. Kiel, U.S.M.J. dated September 20, 2021 pursuant to Fed. R. Civ. P. 72 and L. Civ. R. 72.1(c)(1).

3. Attached hereto as **Exhibit A** is a true and correct copy of the order entered by the Court on September 20, 2021 (ECF No. 88) (the "Order").

4. Attached hereto as **Exhibit B** is a true and correct copy of the transcript from the proceedings held on September 20, 2021 before the Hon. Edward S. Kiel, U.S.M.J.

5. Attached hereto as **Exhibit C** are true and correct copies of relevant pages from the transcript of the deposition of defendant Peony Lin dated November 6, 2020 showing that attorney Jeff Rosenfeld appeared on behalf of plaintiff.

I declare, pursuant to 28 U.S.C. § 1746, under penalty of perjury, that the foregoing is true and correct.

Dated: October 4, 2021

/s/ Brian M. Block
BRIAN M. BLOCK